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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
:  
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
:  
Debtors<sup>1</sup>. : (Jointly Administered)  
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**THIRTY FIRST MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC  
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF  
APRIL 1, 2022 THROUGH AND INCLUDING APRIL 30, 2022**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	April 1, 2022 – April 30, 2022
Total Amount of Fees Incurred:	\$40,346.00
Total Fees Requested (80%):	\$32,276.80
Total Reimbursement of Expenses Incurred:	\$25.00
Total Reimbursement of Expenses Requested (100%):	\$25.00
Total compensation and Reimbursement Requested in this Statement:	\$32,301.80
This is Applicant's:	Thirty First Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated December 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Thirty First Monthly Fee Statement (the "Fee Statement") for the period of April 1, 2022 through and including April 30, 2022 (the "Statement Period").

**Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$40,346.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$32,276.80.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,384.10<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$345.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$25.00 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$32,276.80, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

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<sup>2</sup> The blended hourly billing rate of \$1,384.10 is derived by dividing the total fees for attorneys of \$40,139.00 by the total hours of 29.0.

<sup>3</sup> The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$207.00 by the total hours of .6.

connection with such services during the Statement Period (*i.e.*, \$40,346.00) and (ii) payment of \$25.00 for actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: May 16, 2022  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
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Jennifer S. Feeney, Esq.  
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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU06	Employment and Fee Applications	2.0	\$1,523.00
PU08	Litigation: Contest Matters, Adversary	2.4	\$3,263.00
PU09	Meetings and Communications w/ AHC	5.3	\$7,367.00
PU11	Plan & Disclosure Statement	19.9	\$28,193.00
	<b>TOTALS:</b>	<b>29.6</b>	<b>\$40,346.00</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1470.00	24.3	\$35,721.00
Jennifer S. Feeney ("JSF") Partner	1998	\$940.00	4.7	\$4,418.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$345.00	.6	\$207.00
	<b>TOTAL</b>		<b>29.6</b>	<b>\$40,346.00</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

May 10, 2022  
BILL NO. 223445

For Services Rendered Through April 30, 2022:

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Phase: PU06	EMPLOYMENT & FEE APPLICATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/27/22 JSF	Telephone Call(s) Attend Omnibus Hearing re: Fee Applications	.80	752.00
04/28/22 JSF	Examine Documents Review of March Time Detail	.40	376.00
04/29/22 JSF	Examine Documents Review of March Monthly Fee Statement	.20	188.00
04/29/22 JKH	Prepare Papers Prepare monthly statement	.60	207.00
TOTAL PHASE PU06		2.00	\$1,523.00

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/22 JSF	Examine Documents Review of Summary Updates of Insurance Litigation	.30	282.00
04/14/22 JSF	Examine Documents Debtor's Motion to Extend Injunction	.20	188.00
04/19/22 MLC	Correspondence Correspondence with AHC counsel re extension of preliminary injunction order	.60	882.00
04/20/22 MLC	Correspondence Update re second circuit argument and pending motion re KEIP/KERP	.80	1,176.00
04/27/22 MLC	Review Documents Review of update of pending matters/appeal	.50	735.00
TOTAL PHASE PU08		2.40	\$3,263.00

Phase: PU09

MEETINGS & COMMUNICATIONS W/ AD HOC

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/22 JSF	Telephone Call(s) Attend Weekly AHC Meeting	.50	470.00

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Client/Matter: 20186/0002  
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May 10, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/22 MLC	Review Documents Review of status report regarding motions for partial summary judgment on insurance issues	1.30	1,911.00
04/07/22 MLC	Conference call(s) Conference call with State leadership	.40	588.00
04/14/22 MLC	Correspondence Conference call with state leadership and AHC co-counsel	.50	735.00
04/15/22 MLC	Correspondence Correspondence with co-counsel	.40	588.00
04/18/22 MLC	Correspondence Correspondence with States leadership re extension of preliminary injunction	.60	882.00
04/19/22 MLC	Conference call(s) Conference call with State leadership and AHC co-counsel to prepare for appellate argument	.50	735.00
04/20/22 MLC	Conference call(s) Conference call with AHC State Leadership and AHC co-counsel Re appeal preparation	.80	1,176.00
04/27/22 JSF	Telephone Call(s) Attend Status Update Meeeting of AHC	.30	282.00

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May 10, 2022  
BILL NO. 223445

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
TOTAL PHASE PU09		5.30	\$7,367.00

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Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/22 MLC	Conference call(s) Correspondence with co-counsel re: certain appellate issues	1.10	1,617.00
04/04/22 MLC	Correspondence Correspondence with co-counsel re: certain appellate issues and scheduling	.40	588.00
04/10/22 MLC	Correspondence Correspondence with co-counsel with AHC re: appeal	.30	441.00
04/11/22 MLC	Correspondence Correspondence with State Leadership and AHC co-counsel re: appellate arguments	.70	1,029.00
04/16/22 MLC	Review Documents Review of proposed changes to NOAT	1.50	2,205.00
04/20/22 MLC	Conference call(s) Conference call with AHC co-counsel re preparation for second circuit appeal	1.10	1,617.00

OTTERBOURG P.C.  
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May 10, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/22 MLC	Correspondence Correspondence re: preparation for oral arguments in Second Circuit	.60	882.00
04/21/22 MLC	Review Documents Review of panel of judges for oral argument	.30	441.00
04/22/22 MLC	Correspondence Correspondence re: scheduling of arguments for Second Circuit	.70	1,029.00
04/25/22 MLC	Review Documents Review of papers filed in Second Circuit	.80	1,176.00
04/26/22 MLC	Conference call(s) Participated in Purdue appellate preparation session	3.30	4,851.00
04/26/22 MLC	Conference call(s) Participated in preparation session for Purdue Pharma Second Circuit oral argument by zoom	4.00	5,880.00
04/26/22 MLC	Correspondence Correspondence with co-counsel for AHC and special appellate counsel re preparation for second circuit oral argument	1.10	1,617.00
04/29/22 JSF	Telephone Call(s) Listen to Second Circuit Argument of Appeal of District Court Order Overturning Plan	2.00	1,880.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

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May 10, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/22 MLC	Conference call(s) Second Circuit Oral Argument	2.00	2,940.00
TOTAL PHASE PU11		19.90	\$28,193.00
		TOTAL FOR SERVICES	\$40,346.00

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**



**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Electronic Research	\$25.00
<b>TOTAL:</b>	<b>\$25.00</b>

**EXHIBIT E**

**Expense Detail**

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May 10, 2022  
BILL NO. 223445

DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research	25.00
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TOTAL DISBURSEMENTS	25.00